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COLUMBIA | GREENVILLE

April 19, 2006

FILED ELECTRONICALLY
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Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

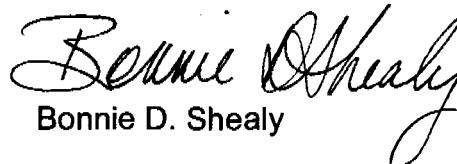
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Re: PUPS - 811
Docket No. 2005-390-C

Dear Mr. Terreni:

Enclosed for filing please find the Rebuttal Testimony of James Glyn Smith which we are filing on behalf of Palmetto Utility Protection Services, Inc. By copy of this letter we are serving the same on all parties of record. Please stamp the extra copy provided as proof of filing and return it with our courier.

Very truly yours,
ROBINSON, MCFADDEN & MOORE, P.C.


Bonnie D. Shealy

/bds
Enclosure
cc/enc:

Ms. Rhonda Dotman, PUPS (via email)
Mr. Glyn Smith (via email)
Nanette S. Edward, ORS Staff Attorney (via email & U.S. Mail)
Florence P. Belser, ORS General Counsel (via email & U.S. Mail)
Patrick W. Turner, BellSouth General Counsel (via email & U.S. Mail)
Scott Elliott, Esquire (via email & U.S. Mail)
M. John Bowen, Jr., Esquire (via email & U.S. Mail)
Margaret M. Fox, Esquire (via email & U.S. Mail)
John M.S. Hoefer, Esquire (via email & U.S. Mail)
Steven W. Hamm, Esquire (via email & U.S. Mail)
C. Jo Anne Wessinger Hill, Esquire (via email & U.S. Mail)
Ms. Daphne Dukes (via email)

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BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2005-390-C

IN RE:)
)
APPLICATION OF PALMETTO UTILITY)
PROTECTION SERVICES, INC. FOR)
ASSIGNMENT OF THE 811)
ABBREVIATED DIALING CODE IN)
SOUTH CAROLINA)
_____)

REBUTTAL TESTIMONY OF JAMES GLYN SMITH
ON BEHALF OF
PALMETTO UTILITY PROTECTION SERVICES, INC.

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is James Glyn Smith and my business address is 810 Dutch Square
3 Boulevard, Suite 320, Columbia, South Carolina 29210. My telephone number is
4 (803) 939-1117.

5 Q. ARE YOU THE SAME PERSON WHO PREVIOUSLY FILED TESTIMONY IN
6 THIS PROCEEDING?

7 A. Yes.

8 Q. HAVE YOU REVIEWED THE TESTIMONY OF KATHY BLAKE FILED ON
9 BEHALF OF BELL SOUTH AND MAK MOORE ON BEHALF OF THE OFFICE
10 OF REGULATORY STAFF?

11 A. Yes, I have.

12 Q. HAVE YOU REVIEWED THE CORRESPONDENCE FROM COUNSEL FOR
13 THE S.C. TELEPHONE COALITION REGARDING TESTIMONY?

14 A. Yes.

15 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY.

16 A. Specifically, my rebuttal testimony comments upon the charges which BellSouth
17 and members of the S.C. Telephone Coalition have indicated may be imposed
18 upon PUPs related for the "811" dialing code.

19 Q. WOULD YOU PLEASE EXPLAIN.

20 A. Ms. Blake for BellSouth and Ms. Fox for the S.C. Telephone Coalition have both
21 indicated that the member companies intend to make the "811" service available
22 by tariff. As I indicated in my direct testimony, PUPs needs to know the amounts
23 that the carriers intend to charge for this service in order to budget for the
24 expense by June 30, 2006.

1 Q. DOES PUPS NOW SEEK A RULING IN THIS PROCEEDING ON WHAT MAY
2 BE CHARGED?

3 A. No. However, since the carriers who intend to charge for "811" have indicated
4 they will file tariffs, we are requesting that the Commission require any carriers
5 who intend to impose charges for "811" to file their proposed tariffs early enough
6 to resolve any related issues prior to June 30, 2006. Since the carriers have not
7 yet provided us with proposed charges, we are not able to comment on any
8 specific charges. We do believe, however, that under the FCC Order, the
9 charges must be calculated to recover the cost of implementing "811" and
10 nothing more.

11 Q. DOES PUPS PROPOSE A SPECIFIC DATE FOR TARIFF FILINGS BY
12 CARRIERS WHO INTEND TO CHARGE FOR 811?

13 A. Yes, May 15, 2006. This date would allow PUPs and the Office of Regulatory
14 Staff adequate time to review the tariff filings and, if necessary, object to the
15 proposed charges. This would also give the Commission time to resolve any
16 issues or objections by June 30, 2006.

17 Q. DOES THE FCC'S ORDER ADDRESS COSTS ASSOCIATED WITH THE "811"
18 DIALING CODE?

19 A. The order does not specify parameters for cost recovery even though it
20 mandates implementation of "811." The FCC indicates that the state commission
21 is in the best position to address issues related to cost recovery.

22 Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?

23 A. Yes.

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2005-390-C**

In Re:

Application of Palmetto Utility
Protection Services, Inc. for
Assignment of the 811 Abbreviated
Dialing Code in South Carolina

CERTIFICATE OF SERVICE

This is to certify that I, Lori W. Foy, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Rebuttal Testimony of James Glyn Smith on Behalf of Palmetto Utility Protection Services, Inc.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Patrick W. Turner, Esquire,
BellSouth Telecommunications, Inc.,
P.O. Office Box 752
Columbia, SC 29202

Scott A. Elliott, Esquire
Elliott & Elliott
721 Olive Street
Columbia, SC 29205

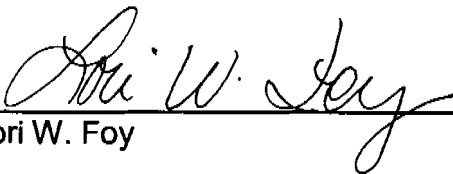
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1600 Marion Street
P.O. Drawer 7788
Columbia, SC 29202-7788

Dated at Columbia, South Carolina this 19th day of April, 2006.


Lori W. Foy